

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA
OMAHA DIVISION

THOMAS M. FREDRICKSEN, JR.,

Plaintiff,

vs.

CHILDREN'S HOSPITAL & MEDICAL
CENTER, a non-profit domestic
corporation, NEBRASKA PEDIATRIC
PRACTICE, INC; a non-profit domestic
corporation; UNMC PHYSICIANS, a non-
profit domestic corporation, and GLEN M.
GINSBURG, M.D., an individual.

Defendants.

CASE NO: 8:15-cv-274

COMPLAINT AND JURY DEMAND

Thomas M. Fredricksen, Jr., Plaintiff, in the above-captioned matter, by and through his counsel of record, for his causes of action against Defendants, and each of them, alleges:

PRELIMINARY STATEMENT

1. This is a civil action in which the Plaintiff seeks to recover damages for permanent injuries suffered while the Plaintiff was a under the care of the Defendants, and each of them, on September 3, 2010.

JURISDICTION AND VENUE

2. Jurisdiction in this court is based upon diversity of citizenship arising under 28 U.S.C. §1332(a) and the amount in controversy exceeds Seventy-five thousand dollars (\$75,000.00) exclusive of interest and costs.

3. Venue is proper in this District pursuant to 28 U.S.C. 1391 because the events